R20

0751

SYNTEX

REMEDIAL ALTERNATIVES REPORT

The site map shows the subsites: Trench Area, Burn Area, Irrigation/Spill Area, Lagoon Area, and Slough Area. The highest concentrations of dioxin are shown as dark areas. TCDD concentration is highest in the Lagoon Area, which is the only area which Syntex has proposed for excavation.

Lagoon Area - Maximum concentration 1380 ppb

Excavate the hot zones proposed, backfill, cover with 6" topsoil, and reestablish veg.
Two areas 60 X 60 feet and 1.5 feet deep are proposed to be excavated - 5400 cu ft
400 cu yd
The fact that TCDD levels exceeded 20 ppb below 1.5 ft. was not considered by Syntex.
Syntex proposes a 200 ppb action level for subsurface TCDD - below 1.5 feet
There are levels of TCDD to 30 ppb at a depth to 3 feet.

Trench Area - Maximum concentration 67 ppb

Excavation in the Trench Area was not proposed.
The Trench Area contained areas which revealed surface concentrations of TCDD greater than 20 ppb, i.e., 67, 52, 43 ppb.
Proposal is to regrade the surface, install 6" topsoil cover and reestablish vegetation.

Slough Area - Maximum concentration 8.4 ppb

Maximum concentration measured in the Slough in Feb. 84 was 8.4 ppb, Summer 1985 sampling resulted in maximum concentration of 1.5 ppb.
Area us currently fenced.
5 alternatives were proposed, alternatives are similar to previously proposed.
Geotextile liner deleted from proposal.
The new alternatives proposed include: additional fencing
excavation to create a new slough channel 50' east of current slough and fill in existing slough

Syntex preferred alternative: removal of existing vegetation at the ground surface (no removal of subsurface trunks or roots), backfill slough with clay, grade to produce gradual drainage and reestablish vegetation.

Burn Area - Maximum concentration 24 ppb

Syntex proposes to fill in this area and maintain vegetation.

Irrigation Area - Maximum concentration ~~17~~ 29 ppb

Syntex proposes to maintain vegetation.

Spill Area - Maximum concentration 4.9 ppb

One additional alternative was proposed for the Spill Area - which was paving the site with asphalt, however, Syntex is still proposing the same alternative, which is remove gravel existing, backfill with topsoil and establish vegetation.

OTHER ISSUES

1. The method of averaging sample results does not follow the 95% confidence level sampling protocol.
2. The presence of other volatile organic substances in the soil and groundwater has not been addressed.
3. The use of drinking water standards for groundwater beneath the site has been directly disputed. Syntex has stated that the groundwater is not used for drinking.
4. A reduced scope has been proposed for future groundwater monitoring.
5. The revised report does not follow the requirements for remedy screening and selection.

SUMMARY

Compare summary tables for remedial alt.'s in original report and new report.

Action level in lagoon area below 1.5 ft. of 200 ppb is not acceptable

CDC letter indicates 20 ppb

ROD being drafted

Based on 20 ppb

Preferred remedy

-Agree to maintain vegetation in Spill/Irrigation and Burn areas

-Require more excavation in Lagoon, Trench and Slough areas

Water supply in area needs to be addressed further.